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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

Ryan Q. Claridge

Plaintiff,

v.

I-FLOW CORPORATION, a Delaware corporation; I-FLOW, LLC, a Delaware limited liability company; DJO LLC (f.k.a. DJ ORTHOPEDICS, LLC), a Delaware limited liability company; DJO, INCORPORATED, aka DJO, INC., a Delaware corporation; STRYKER CORPORATION, a Michigan corporation; and STRYKER SALES CORPORATION, a Michigan corporation,

Defendants.

NO. 2:18-cv-01654-GMN-PAL

**STIPULATION TO EXTEND
 PLAINTIFF'S DEADLINES TO
 RESPOND TO PENDING MOTIONS IN
 LIMINE AND MOTIONS FOR
 SUMMARY JUDGMENT**

Pursuant to LR 26-3, Plaintiff Ryan Claridge and Defendants I-Flow Corporation, I-Flow, LLC (collectively, "I-Flow"), Stryker Corporation, and Stryker Sales Corporation (collectively, "Stryker") hereby stipulate an extension of Plaintiff's deadlines to respond to the pending motions in limine and motions for summary judgment, which were filed as ECF Nos. 297, 299, 301, and 302 (the "Pending Motions").

1 Pursuant to the Court's Order dated June 17, 2021 (ECF No. 295), the deadline to file
2 dispositive motions was July 16, 2021, the deadline to file responses thereto is August 16, 2021,
3 and the deadline to file reply memoranda is September 3, 2021. Stryker and I-Flow filed the
4 Pending Motions on July 16, 2021.

5 There is good cause for extending the deadlines for Plaintiff to respond to the Pending
6 Motions. The parties continue to engage in settlement negotiations, which, if they are fruitful, may
7 avoid the necessity and burdens of resolving the Pending Motions and may be dispositive of the
8 case. The four Pending Motions—which are detailed, lengthy, and together supported by 96
9 exhibits—will necessitate extensive efforts and use of resources by Plaintiff if he is required to
10 complete his oppositions thereto. That burden should not be imposed unnecessarily.

11 Because of the complexity and seriousness of the issues at stake in this litigation, and
12 despite diligent efforts of the parties, settlement negotiations have not yet concluded. The parties
13 anticipate that a three-week extension will allow the parties either to reach an agreement or to
14 know that settlement at this stage of the litigation is unlikely.

15 Accordingly, with the Court's consent, the Parties agree to the following amendments to
16 the deadlines relating to the Pending Motions:

- 17 1. Plaintiff's deadline to file responses to the Pending Motions shall be September 7, 2021.
- 18 2. Defendants' deadline to file reply memoranda in support of the Pending Motions shall be
19 October 1, 2021.

20 **THE PARTIES STIPULATE AND AGREE THAT:**

21 With the Court's consent, the deadlines related to the Pending Motions are amended as described
22 above.

1 **IT IS SO STIPULATED AND AGREED.**

2 DEWSNUP KING OLSEN WOREL
3 HAVAS MORTENSEN

4 By: /s/ Colin P. King
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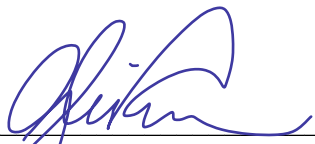
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20 **IT IS SO ORDERED.**

21 Dated this 4 day of August, 2021.

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24
25 Gloria M. Navarro, District Judge
26 UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on behalf of DEWSNUP KING OLSEN WOREL HAVAS MORTENSEN that, on the 29th of July 2021, I electronically transmitted the foregoing **STIPULATION TO EXTEND PLAINTIFF'S DEADLINES TO RESPOND TO PENDING MOTIONS IN LIMINE AND MOTIONS FOR SUMMARY JUDGMENT** using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all counsel in the above-captioned matter.

/s/ Melissa Tabish
Melissa Tabish